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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT	: Dimitri Gorokhovik		
SERIAL NO.	: 10/084,721	EXAMINER	: Antonio A. Caschera
FILED	: February 25, 2002	ART UNIT	: 2676
FOR	: METHOD OF CONTROLLING THE DISPLAY OF A CHARACTER BASED ON A DYNAMIC CODE GENERATION		

REPLY BRIEF TRANSMITTAL LETTER

Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA. 22313-1450

Dear Sir:

Appellants respectfully submit three copies of a Reply Brief For Appellants that includes an Appendix with the pending claims. The Reply Brief is now due on February 28, 2005.

Should the Examiner deem that there are any issues which may be best resolved by telephone communication, kindly telephone Applicants undersigned representative at the number listed below.

Respectfully submitted,
Dicran Halajian
Registration No. 39,703

By: Steve Cha
Attorney for Applicant
Registration No. 44,069

Date: February 18, 2005

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Steve Cha, Reg. No. 44,069
(Name of Registered Rep.)

(Signature and Date)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Before the Board of Patent Appeals and Interferences

In re the Application

Inventor	:	**Dimitri Gorokhovik**
Application No.	:	**10/084,721**
Filed	:	**February 25, 2002**
For	:	**METHOD OF CONTROLLING THE DISPLAY OF A CHARACTER BASED ON A DYNAMIC CODE GENERATION**

REPLY BRIEF

On Appeal from Group Art Unit 2676

Date: February 18, 2005

Dicran Halajian
Registration No. 39,703
By: Steve Cha
Attorney for Applicant
Registration No. 44,069

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Steve Cha, Reg. No. 44,069
(Name of Registered Rep.)

(Signature and Date)

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II. RELATED APPEALS AND INTERFERENCES

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Reference is made to the Appeal Brief.

V. SUMMARY OF THE INVENTION

Reference is made to the Appeal Brief.

VI. ISSUE

Reference is made to the Appeal Brief

VII. GROUPING OF CLAIMS

Claims 1-8 stand or fall together.

VIII. ARGUMENT

Claims 1, 2, 4, 5, 7 and 8 stand rejected under 35 USC 103(a) as being unpatable over Guha (U.S.P. no. 6,005,588). The rejection of the claims is in error as the reference fails to show a limitation cited in the independent claims 1, 4, 7 and 8. Claims 2 and 5 depend from claims 1 and 4, respectively.

The invention recited in instant claim 1, which is typical of the subject matter recited in each independent claim, claims the generation of an executable code (BIN) from a summary description (DES) of characters that are stored in a database and the execution of the executable code (BIN) corresponding to the character so as to display the character on the output apparatus, wherein generating the executable code comprises two substeps: a step of extracting, from the summary description (DES) of the character, a nonexecutable symbolic code (SYM) defining actions for coloring in points on the output apparatus and a step of dynamic generation, from the symbolic code (SYM), of the executable code.

In the Examiner's Answer, dated December 29, 2004, to the Applicant's Appeal Brief, dated October 1, 2004 the examiner has again interpreted or drawn analogies between subject matter recited in the claims and elements taught by Guha. More specifically, the examiner repeats the argument made that "character bitmaps [are] functionally equivalent to the nonexecutable symbolic code of the applicant's claims." (see Examiner's Answer, page 8, lines 8-10).

In reply, the applicant respectfully again disagrees that bitmap as described by Guha is functionally equivalent to the symbolic code claimed, and would refer the Board to a well-known and definitive source to emphasize the significant difference between

bitmaps and symbolic code. With regard to a "bitmap", this is defined as "the representation of a video image stored in a computer's memory as a set of bits. Each picture element (pixel) corresponding to a tiny dot onscreen, is controlled by anon or off code stored as a bit (1 for on, or 0 for off) for black-and-white displays. ... The bit map is a grid of rows and columns of the 1s and 0s that the computer translates into pixels to display onscreen." Webster's New World Dictionary of Computer Terms, 8th Edition, 2000, pp 65-66. Copies of the pages cited, herein, are included in Appendix B. The same reference defines symbolic cod[ing] as "expressing an algorithm in coded form by using symbols and numbers that people can understand (rather than the binary numbers that computers use). All modern programming languages use symbolic coding." *Id.* at 518. Accordingly, symbolic code is known in the art to use symbols and numbers. Such symbols and numbers may be represented by tree-like structures and/or code structures, which were referred to in the written description of the instant application and referred to by the applicant to illustrate the distinction of bitmaps from symbolic code.

Accordingly, the bitmap disclosed by Guha and the symbolic code recited in the claims are not equivalent as the bitmap represents a definitive storage of 1s and 0s to represent a character, whereas the nonexecutable symbolic code claimed is representative of a non-executable algorithm using symbols and numbers.

The bitmaps of Guha, hence, can not be interpreted to be functionally equivalent to the symbolic code of the instant invention as a code generation module is required to be executed on the bitmap to determine the resultant executable code (see Examiner's Answer, page 8, lines 13-14), whereas the symbolic code claimed provides the instruction for defining the resultant executable code.

Having shown that the bitmap of Guha is not functionally equivalent to the symbolic code recited in the claims, applicant respectfully submits that a *prima facie* case of obviousness has not been set forth.

With regard to independent claims 4, 7 and 8, these claims were rejected for the same reason stated in rejected claim 1. Claims 4, 7 and 8 include subject matter similar to that recited in claim 1. Hence, for the remarks made with regard to claim 1, which are repeated in overcoming the rejection of claims 4, 7 and 8, applicant respectfully submits that a *prima facie* case of obviousness has not been set forth.

With regard to dependent claims 2, 3, 5 and 6 these claims depend from claims 1 and 4, respectively. Applicant respectfully submits that these claims are allowable at least for their dependence upon allowable base claims, without even contemplating the merits of the dependent claims.

IX. CONCLUSION

In view of the above, it is respectfully submitted that the referenced teaching, fails to render obvious the subject matter of any of the present claims. Therefore, reversal of all outstanding grounds of rejection is respectfully solicited.

Respectfully submitted,

Dicran Halajian
Registration No. 39,703

Date: February 18, 2005

By: Steve Cha
Attorney for Applicant
Registration No. 44,069

X. APPENDIX A: THE CLAIMS ON APPEAL

Reference is made to the Appeal Brief.

XI: APPENDIX B:

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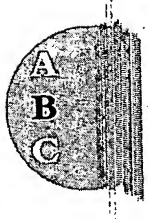

biological feedback device A device that translates eye movements, body movements, and even brain waves into computer input.

biometric authentication A method of authentication that requires a biological scan of some sort, such as a retinal scan or voice recognition.

BIOS Acronym for Basic Input-Output System. A set of programs encoded in read-only memory (ROM) in IBM PC–compatible computers. These programs handle startup operations such as the Power-On Self-Test (POST) and low-level control for hardware, such as disk drives, keyboard, and monitor. Popular brands of BIOS chips on motherboards sold today include Phoenix Technologies and American Megatrends, Inc. Some system components have their own BIOS chip, whose instructions are also read into the PC's memory at startup. The BIOS on a hard disk controller, for example, stores a table of tracks and sectors on the drive.

B-ISDN See *Broadband ISDN.*

bit The basic unit of information in a binary numbering system (BInary digiT). The electronic circuitry in computers detects the difference between two states (high current and low current) and represent these states as one of the two numbers in a binary system: 1 or 0. These basic high/low, either/or, yes/no units of information are called bits. Because building a reliable circuit that tells the difference between a 1 and a 0 is easy and inexpensive, computers are accurate in their internal processing capabilities, typically making fewer than one internal error in every 100 billion processing operations. Eight bits comprise 1 byte, or octet.

bit depth In a scanner, the length (expressed in bits) of the storage unit used to store information about the scanned image. The greater the bit depth, the better the scanner's resolution. A common bit depth for a home-quality scanner is 30 bits.

bit length In encryption, the length (expressed in bits) of the key used to encode and decode the text data. The greater the bit length, the stronger (less breakable) the encryption.

bitmap The representation of a video image stored in a computer's memory as a set of bits. Each picture element (pixel), corresponding to a tiny dot onscreen, is controlled by an on or

off code stored as a bit (1 for on, or 0 for off) for black-and-white displays. Color and shades of gray require more information. The bit map is a grid of rows and columns of the 1s and 0s that the computer translates into pixels to display onscreen. See *bit-mapped graphic* and *block graphics.*

bit-mapped font A screen or printer font in which each character is composed of a pattern of dots. To display or print bit-mapped fonts, the computer or printer must keep a full representation of each character in memory. When referring to bit-mapped fonts, the term *font* should be taken literally as a complete set of characters of a given typeface, weight, posture, and type size. If you want to use Palatino (Roman) 12 and Palatino Italic 14, for example, you must load two complete sets of characters into memory. You can't scale bit-mapped fonts up or down without introducing grotesque staircase distortions, called aliasing. See *anti-aliasing.* Compare to *outline font.*

bit-mapped graphic A graphic image formed by a pattern of pixels and limited in resolution to the maximum resolution of the display or printer on which it is displayed. Bit-mapped graphics are produced by paint programs. Considered inferior to vector graphics for most applications, bit-mapped graphics may have aliasing caused by the square shape of pixels. See *Encapsulated PostScript (EPS) file, object-oriented graphic,* and *aliasing.* Compare to *vector graphics.*

BITNET A wide area network (WAN) that links mainframe computer systems at approximately 2,500 universities and research institutions in North America, Europe, and Japan. BITNET (an acronym for Because It's Time Network) does not use the TCP/IP protocols but can exchange e-mail with the Internet. BITNET is operated by the Corporation for Research and Educational Networking (CREN), with headquarters in Washington, D.C. To become a member of the network, an organization must pay for a leased line that connects to the nearest existing BITNET site, and it must also agree to let another institution connect with this line in the future. Faced with competition from the Internet, BITNET is slowly dying. See *CERN.*

bits per inch (bpi) In magnetic media, such as backup tape drives or disk drives, a measurement of the medium's recording density.

bits per second (bps measurement of data t
bps rates frequently ar
modems and serial po
mentally: 110 bps, 150
1800 bps, 9600 bps, 1
bps, and 115200 bps.

black letter In typ
German handwriting
often are called Frakt
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their pens from the li
the continuous flow

black-write technic

blank cell In a spr
values, labels, or form
default formatting.

bleed In desktop p
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as the thumb tab ind
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perimeter.

bleed capability

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Preferences) as well
installed applications

blind carbon copy
that is sent to one o
the recipient. Also c

blind certificate
that contains no inf
issued. Blind certific
user's identity is uni
to be disguised (suc

swap file In Microsoft Windows 3.1 and Microsoft Windows 95/98, a large, hidden system file that stores program instructions and data that don't fit in the computer's random access memory (RAM). See *virtual memory*.

swash A character that sweeps over or under adjacent characters with a curvilinear flourish.

switch An addition to an MS-DOS command that modifies the way that the command performs its function. The switch symbol is a forward slash (/), which is followed by a letter. For example, the command DIR /p displays a directory listing one page at a time.

switchable power supply A power supply that lets you use both U.S. and European electrical power to run the computer. Unlike cheap travel converters, which can ruin a PC's electronics, switchable power supplies enable a computer to use either 115-volt 60 Hz U.S. electricity, or 230-volt 50 Hz European electricity.

Sybase, Inc. A major publisher of Unix-based relational database management systems (RDMS) for client/server computing in multiuser enterprise contexts. Based in Emeryville, California, Sybase offers extensive consulting and system integration services to corporations that need sophisticated database management systems.

Symantec The leading publisher of utility software for Macintosh and Microsoft Windows computers, including the well-known Norton AntiVirus and Norton Utilities. Based in Cupertino, California, the company also publishes a number of popular application programs, including Act! (a contact management program), WinFax (a fax program for Microsoft Windows), and pcANYWHERE (a remote control program).

symbolic coding Expressing an algorithm in coded form by using symbols and numbers that people can understand (rather than the binary numbers that computers use). All modern programming languages use symbolic coding.

symmetric key encryption algorithm An encryption algorithm that uses the same key to encode and decode messages. Symmetric key algorithms have many advantages: They require relatively small amounts of computer overhead, and when used